

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	Chapter 11
	§	
WALNUT HILLS-GREENVILLE AVE, LLC,	§	Case No. 24-31485
	§	
Debtor.	§	
	§	

**UNITED TEXAS BANK'S AMENDED WITNESS & EXHIBIT LIST FOR HEARING ON
SEPTEMBER 3, 2024, AT 10:30 A.M.**

United Texas Bank ("UTB"), files this Amended Witness & Exhibit List for the hearing on **Tuesday, September 3, 2024 at 10:30 a.m.**, prevailing central time (the "Hearing"), before the Honorable Jeffrey P. Norman, United States Bankruptcy Judge, to consider UTB's *Motion for Order Appointing Examiner* [Dkt. #33] (the "Examiner Motion").¹

WITNESSES

UTB may call any of the following witnesses at the Hearing:

1. Greg Quarles, United Texas Bank.
2. Joseph Lenahan.
3. Mark Previty.
4. Any representative(s) of the Debtor.
5. Any witness called or designated by any other party.
6. Any witness necessary to impeach the testimony of any witness called or designated by any other party.
7. Any witness necessary to rebut the testimony of any witness called or designated by any other party.

¹ This Amended Witness & Exhibit List is filed to add Greg Quarles as a witness. The Exhibits are unchanged.

EXHIBITS

UTB may offer into evidence one or more of the following exhibits at the Hearing:

Ex. #	Description of Exhibit	Offered	Objection	Admitted
A.	Loan Agreement dated March 16, 2022			
B.	Promissory Note dated March 16, 2022			
C.	Deed of Trust, Security Agreement, Assignment of Rents, Fixture Filing, and Financing Statement dated March 16, 2022			
D.	Pledge and Security Agreement dated March 16, 2022			
E.	Guaranty Agreement dated March 16, 2022			
F.	Master Lease Agreement executed on December 1, 2020			
G.	Subordination, Non-Disturbance and Attornment Agreement recorded March 18, 2022			
H.	Walnut Hills-Greenville Ave, LLC (“ Debtor ”) TXSOS Filings (Certificate of Formation and Public Information Report)			
I.	Advanced Dallas Hospital & Clinics, LLC (“ Tenant ”) TXSOS Filings (Certificate of Formation and Public Information Report)			
J.	Cognizant Management Solutions, LLC TXSOS Filings (Certificate of Formation and Public Information Report)			
K.	Zoo Capital Holdings, LLC TXSOS Filings (Certificate of Formation and Public Information Report)			
L.	Tenant Income Statements (2020-2023)			
M.	Debtor Income Statement (2020-2023)			
N.	Chapter 11 Voluntary Petition [Dkt. #1]			
O.	Balance Sheet [Dkt. #2]			
P.	Cash Flow Statement [Dkt. #3]			
Q.	Statement of Operations [Dkt. #4]			

Ex. #	Description of Exhibit	Offered	Objection	Admitted
R.	Schedules and Statement of Financial Affairs [Dkt. #17]			
S.	Debtor's Status Report per 11 U.S.C. § 1188(c) [Dkt. #26]			
T.	Monthly Operating Report, April 2024 [Dkt. #27]			
U.	Monthly Operating Report, May 2024 [Dkt. #30]			
V.	Debtor's Plan of Reorganization [Dkt. #37]			
W.	Debtor's Disclosure Statement (7/30/2024) [Dkt. #38]			
X.	Debtor's Response to United Texas Bank's Motion for Order Appointing Examiner [Dkt. #41]			
Y.	Email dated July 5, 2024			
Z.	Email dated July 23, 2024			
AA.	Email dated July 31, 2024			
BB.	Email dated August 2, 2024			
	Any pleadings, reports, orders, bankruptcy schedules, statements of financial affairs, monthly operating reports, proofs of claim, or other documents filed of record in the Debtors' bankruptcy cases.			
	Any exhibits offered by any other party.			
	Any exhibits necessary for impeachment purposes.			
	Any exhibits for rebuttal purposes.			
	Any appendices, exhibits, or other attachments to any of the foregoing.			

UTB reserves the right to supplement and/or amend this Witness & Exhibit List prior to the Hearing.

DATED: August 29, 2024

Respectfully submitted,

KANE RUSSELL COLEMAN LOGAN PC

By: /s/ Michael P. Ridulfo

Michael P. Ridulfo

State Bar No. 16902020

Fed. Id. 27086

5151 San Felipe, Suite 800

Houston, Texas 77056

Tel.: (713) 425-7400

Fax: (713) 425-7700

Email: whotze@krcl.com

John J. Kane

State Bar No. 24066794

Kyle Woodard

State Bar No. 24102661

901 Main Street, Suite 5200

Dallas, Texas 75202

Tel.: (214) 777-4200

Fax: (214) 777-4299

Email: jkane@krcl.com

Email: kwoodard@krcl.com

Counsel for United Texas Bank

CERTIFICATE OF SERVICE

This is to certify that on August 29, 2024, a true and correct copy of the foregoing amended notice was filed with the Court and served (i) via the Court's CM/ECF notification system upon all parties registered to receive such electronic notices in this case and (ii) via first-class mail, postage prepaid, upon all parties on the attached Service List.

/s/ Michael P. Ridulfo

Michael P. Ridulfo

Label Matrix for local noticing
0541-4
Case 24-31485
Southern District of Texas
Houston
Thu Aug 29 11:06:04 CDT 2024

Dallas County
Linebarger Goggan Blair & Sampson, LLP
c/o John K Turner
2777 N. Stemmons Frwy Ste 1000
Dallas, TX 75207-2328

Walnut Hills-Greenville Ave, LLC
1911 Bagby St Suite 300
Houston, TX 77002-8740

4
United States Bankruptcy Court
PO Box 61010
Houston, TX 77208-1010

Advanced Dallas Hospital & Clinics, LLC
1911 Bagby Street Suite 200
Houston, TX 77002-8860

Clinical Communication Partners, LLC
c/o Lisa Norman
Andrews Myers, P.C.
1885 Saint James Place, 15th Floor
Houston, Texas 77056-4175

Dallas County
Linebarger Goggan Blair & Sampson, LLP
c/o John Kendrick Turner
2777 N. Stemmons Freeway
Suite 1000
Dallas, TX 75207-2328

Dallas County
c/o Linebarger Goggan Blair & Sampson
2777 N. Stemmons Frwy 1000
Dallas, TX 75207-2328

(p)GRAY REED & MCGRAW LLP
ATTN LISA STUCKETT
1300 POST OAK BLVD STE 2000
HOUSTON TX 77056-8000

Kaine Russell Coleman Logan PC
Attn: Brian Clark
901 Main St Ste 5200
Dallas, TX 75202-3705

The Lane Law Firm
6200 Savoy Dr Ste 1150
Houston, TX 77036-3369

US Trustee
Office of the US Trustee
515 Rusk Ave
Ste 3516
Houston, TX 77002-2604

United Texas Bank
13101 Preston Rd Ste 200
Dallas, TX 75240-5220

Robert C Lane
The Lane Law Firm
6200 Savoy Dr Ste 1150
Houston, TX 77036-3369

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Gray Reed & McGraw LLP
c/o Anna M. Virene
1300 Post Oak Blvd
Houston, TX 77056-3043

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)United Texas Bank

(d)Walnut Hills-Greenville Ave, LLC
1911 Bagby St Suite 300
Houston, TX 77002-8740

End of Label Matrix	
Mailable recipients	13
Bypassed recipients	2
Total	15